

1 HONORABLE BENJAMIN H. SETTLE  
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7 UNITED STATES DISTRICT COURT  
8 WESTERN DISTRICT OF WASHINGTON  
9 AT TACOMA

10 HP TUNERS, LLC, a Nevada limited liability )  
11 company, ) CASE NO. 3:17-cv-05760-BHS  
12 Plaintiff, )  
13 vs. ) **DECLARATION OF STEPHEN G.**  
14 ) **LEATHAM, ESQ. IN SUPPORT OF**  
15 ) **PLAINTIFF'S PETITION FOR FEES**  
16 KEVIN SYKES-BONNETT and SYKED )  
17 ECU TUNING INCORPORATED, a )  
18 Washington corporation, and JOHN )  
19 MARTINSON, )  
20 Defendants. )  
21

22 I, Stephen G. Leatham, Esq., hereby declare as follows:

23 1. I am of legal age, have personal knowledge of the facts provided herein and, if  
24 called as a witness, could and would testify competently to those facts.

25 2. I am a licensed attorney in the State of Washington and am a member in good  
standing of the Washington bar.

3. I have been a licensed attorney in the State of Washington since 1985.

4. I am a partner with the firm of Heurlin, Potter, Jahn, Leatham, Holtmann &  
26 Stoker, P.S.

5. I am an attorney representing Plaintiff HP Tuners, LLC in connection with this

matter.

6. This Declaration is submitted in support of Plaintiff's Petition for Fees as allowed by this Court in its Order Granting Plaintiff's Motion for Sanctions and Scheduling Fee Petition (Docket No. 155).

7. Based on my experience practicing law in this District, I believe that an hourly rate of \$350.00 per hour for attorney time in connection with this matter is reasonable and customary for complex commercial litigation services of this type in this District.

I declare under penalty of perjury under the laws of the United States of America the foregoing is true and correct to the best of my knowledge.

Executed on March 29, 2019 at Vancouver, Washington.

By: s/Stephen G. Leatham  
Stephen G. Leatham

**CERTIFICATE OF SERVICE**

I hereby certify that on March 29, 2019, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system which will electronically send Notice to all Counsel of Record.

s/ Stephen G. Leatham  
Stephen G. Leatham, WSBA #15572  
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Attorney for HP Tuners, Inc.

DECLARATION OF STEPHEN G. LEATHAM, ESQ.  
SUBMITTED IN SUPPORT OF PLAINTIFF'S PETITION  
FOR FEES - 3

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